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October 30, 2019

Via Electronic Filing

The Honorable Leda Dunn Wettre
United States District Court, District of NJ
50 Walnut Street
Newark, New Jersey 07101

**Re: Express Freight Systems Inc. v. YMB Enterprises Inc.
Case No. 2:19-cv-12001-SDW-LDW**

Dear Judge Wettre:

We represent plaintiff Express Freight Systems Inc. ("Plaintiff") in the above action. Currently pending before the Court is defendants YMB Enterprises, Inc. and Joel Mendlovic's motion to dismiss the Complaint. In furtherance of the Court's request during oral argument on the motion on October 24, 2019, please be advised that while Plaintiff maintains that this Court has proper jurisdiction over this matter, if the Court concludes otherwise, then Plaintiff would respectfully request a transfer of the matter to the U.S. District Court, Eastern District of New York, as opposed to dismissal.

Respectfully submitted,

FEITLIN, YOUNGMAN, KARAS & GERSON, LLC

s/ Jonathan M. Ettman

cc: Lawrence Katz, Esq. (via ECF)
Express Freight Systems Inc. (via email)